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007060

January 18, 1990

Meeting Minutes Transmittal/Approval

Unit Managers Meeting: 200-BP-1 Operable Unit

Federal Building, Rm G-53

December 14, 1989

From/
Appvl.: John Broderick Date: 1-23-90
John Broderick, 200-BP-1 Unit Manager, DOE-RL

Appvl.: Doug Sherwood Date: 1-24-90
Doug Sherwood, 200-BP-1 Unit Manager, EPA

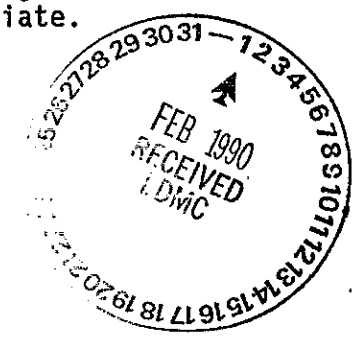
Appvl.: Chandler L. Cline for L.G. Date 1/25/90
Larry Goldstein, 200-BP-1 Unit Manager, WA Department of Ecology

To: Donna Lacombe, PRC
Ward Staubitz, USGS
Jerry Chiaramonte, SWEC/IT (A4-35)
Jack Waite, WHC (H4-52)
Tom Wintczak, WHC (H4-17)
Mel Adams, WHC (H4-55)
Wayne Johnson, WHC (H4-55)
Rich Carlson, WHC (H4-55)
Brian Sprouse, WHC (H4-51)
Bill Price, WHC (SO-03)
Doug Dunster, Golder Assoc.
Mike Thompson, DOE (A6-95)
Diane Clark, DOE (A5-55)
ADMINISTRATIVE RECORD (200-BP-1) [Care of Susan Wray, WHC (H4-51C)]

cc. Ronald D. Izatt (A6-95)
Director, DOE-RL, ERD
Ronald E. Gerton (A6-80)
Director, DOE-RL, WMD
Roger D. Freeberg (A6-95)
Chief, Rstr. Br., DOE-RL/ERD
Steven H. Wisness (A6-95)
Tri-Party Agreement Proj. Mgr
Richard D. Wojtasek (H4-17)
Prgm. Mgr. WHC

Meeting Minutes are attached. Minutes are comprised of the following:
Attachment #1 - Meeting Summary/Summary of Commitments and Agreements;
Attachment #2 - Agenda for the Meeting;
Attachment #3 - Attendance List;
Attachment #4 - Viewgraphs presented by WHC: EPA Comments, and Schedule;
Attachment #5 - Commitments/Agreements Status List.

This was the seventh Unit Managers Meeting conducted for the 200-BP-1 Operable Unit. The meeting was conducted in accordance with provisions of the Hanford Federal Facility Agreement. Minutes are consistent with requirements of the Agreement. Any questions concerning these minutes or the meeting should be addressed to one of the above Operable Unit Managers as appropriate.



Attachment #1

Meeting Summary and Summary of Commitments and Agreements
200-BP-1 Operable Unit Managers Meeting
Federal Building, Room G-53
December 14, 1989

Meeting Summary/Summary of Commitments and Agreements

1. The open action items from the November 17, 1989 unit managers meeting were discussed.

2. Documentation on the preliminary review of existing groundwater monitoring wells was provided to EPA and Ecology.

3. The December 8, 1989 EPA comments on the work plan were discussed. The comments are provided in Attachment #4. A summary of proposed resolutions is as follows:

   - Comment #1: The section in the work plan on Risk Assessment will be temporarily left as is, per the agreement as follows:

Agreement: **Further revisions to address December 8, 1989 EPA comment #1, Risk Assessment, will be on-hold until a formal site-wide risk assessment approach has been developed.**

   - Comment #2: EPA will further discuss/clarify comment on minimum performance criteria. WHC will review tables for consistency.

Action # 2BP1.25: **EPA is to provide further details on minimum performance requirements. Action: Doug Sherwood**

   - Comment #3: Bismuth to be included in lists.
   - Comment #4: Discussion on contaminant transport hypotheses to be revised.

Action # 2BP1.26: **WHC is to provide DOE a rewrite of work plan Section 3.1.3, per EPA comment #4, prior to the January UMM.**

   - Comment #5: EII to be developed/revised.

4. WHC continues to revise the work plan for EPA/Ecology approval. A mid-January issuance date is anticipated.

Attachment #2

200-BP-1 Unit Managers Meeting Agenda
December 14, 1989
1:00 - 2:00 am
Federal Building, Room G-53

Introduction

Status:

- Action Items
- Work Plan
  - o December 8, 1989 EPA Comments
- Remedial Investigation
- Schedule

Issues:

Other Topics:

- Review of Existing Groundwater Monitoring Wells

Agreements and Commitments

Attachment 3

Attendance List
200-BP-1 Operable Unit
Unit Managers Meeting
December 14, 1989

NAME	ORGANIZATION	200-BP-1 RESPONSIBILITY	PHONE
Doug Sherwood	EPA	Unit Mgr	509-376-9529
Larry Goldstein	WDOE	Unit Mgr	206-438-7018
John Bröderick	DOE-RL	Unit Mgr	509-376-4197
Dave Einan	EPA		509-376-3883
Gordon Ballentine	PRC	EPA Consultant	415-543-4880
Ward Staubitz	USGS	EPA Consultant	206-593-6510
Chuck Cline	WDOE	Geohydrologist	206-438-7556
Rich Carlson	WHC	RI Coordinator	509-376-9027
Jim Patterson	WHC	Contractor Representative	509-376-0568
Wayne Johnson	WHC	Envir. Engineering	509-376-1721
James Consort	WHC		509-376-9127
WE Green	WHC		509-376-3886
SW Clark	WHC		509-376-1513
Jack Sonnichsen	WHC		509-376-9956
Marcel Bergeron	PNL		509-376-8410
Jerry Chiaramonte	IT	GSSC for DOE-RL	509-376-7829
Holly Jo Harrison	IT	GSSC for DOE-RL	509-375-4221
Doug Dunster	Golder	Work plan author	206-883-0777

Attachment #4

MAJOR CONCERNS

1. Risk Assessment -
During the past two months special and/or general topics meetings have been held to discuss the topic of risk or performance assessment. The first of these meetings (October 18, 1989), provided a general overview of the performance assessment activities underway at Hanford to support the RI/FS process. This presentation seemed to contain all of the capabilities required to produce an acceptable risk or performance analysis. The approach presented in this meeting was that development of performance assessment capabilities was an activity that required site-wide integration to produce a consistent approach to all risk assessments. Based on this approach and the understanding that performance assessment development activities would continue as previously described, the 200-BP-1 operable unit RI/FS Work Plan was to be approved with little detail in the sections dealing with risk assessment. Concurrently, a meeting was set for November 17, 1989, to discuss specific details of the approach to be used for risk assessment at the 200-BP-1 operable unit. In this meeting, EPA was told that many of the activities required to support risk assessment were not funded under the performance assessment program and therefore much of the specific data required to assess the 200-BP-1 operable unit would not be available.

Although EPA has no direct control over the Department of Energy's performance assessment program, the need for a credible risk assessment represents a major component for evaluating remedial alternatives and supporting the record of decision for all operable units. With the uncertain nature of the scope for the Hanford performance assessment program, it is no longer appropriate to assume that a credible risk assessment capability will be produced without some greater degree of regulatory oversight.

Recommendation. EPA recommends that the work plan not be delayed until such time as an acceptable approach is developed, but that working meetings and continued scoping of technically sound approaches to risk assessment be inserted into the work plan. These meetings would identify additional data to be gathered under the 200-BP-1 work plan (previously assumed to be funded by the performance assessment program). This action could result in conditional approval of the 200-BP-1 work plan contingent on development of a consistent approach to risk assessment. EPA has accepted site-wide or area specific approaches to background soils and groundwater quality and believes that a similar approach needs to be investigated for risk assessment.

2. Analytical Levels -
Discussions of analytical levels adapted from Data Quality Objectives for Remedial Response Activities: Volume 1, Development Process (EPA 1987) have remained substantially unchanged throughout the revision process in spite of fundamental changes in the strategy to be used at Hanford. It was previously agreed that major revisions to the 200-BP-1 work plan were not required, because screening analysis does not represent a major effort in 200-BP-1. Problems still exist with the use of the term "CLP" since few if any of the analyses will be performed at CLP facilities. Previous meetings on this subject have pointed out the problems with the use of CLP to describe other

than CLP contractors. The highly radioactive nature of soil and source material samples at 200-BP-1 will likely require continued modification to the sampling and analysis procedures, detection limits, and analytical levels. For this reason, it was agreed that analytical levels would be specifically identified with minimum performance criteria. Therefore, the work plan must describe, in detail, how minimum performance criteria will be used for 200-BP-1 samples. The necessary level of detail for sample tracking and documentation (one of the minimum performance criteria) must include:

(a) a summary of labeling and preparation of sample containers,
(b) a summary of field documentation and tracking to include; responsible organization, radioactive shipping records, and chain of custody,
(c) a summary of sample transport process (organization, additional documentation)
(d) a summary of sample receipt and log in procedures with responsible organization, and
(e) a summary of laboratory personnel practices for documentation of sample distribution to the analysts.

EPA recognizes that these processes may vary depending on the media being sampled, but in general similar sample tracking and documentation practices will be used for all media and all laboratory analyses independent of analytical level. Similar detail is needed for the other minimum performance criteria.

Confusion still exists in the work plan, the Field Sampling Plan (FSP), and the Quality Assurance Project Plan (QAPP), as to the analytical levels for individual substances or groups of substances. One example of this problem can be seen by comparing Table 24 of the work plan with Table 1 of the FSP. Table 24 states that level III and level V analysis are used for vadose zone soils, while FSP Table 1 shows levels, III, IV, and V with no analytical level for metals analysis. Tables of analytical parameters must also be standardized. Tables 25, 26, and 27 of the field sampling plan need to be consistent with Table 1 of the FSP and Table 1 of the QAPP. Captions for groups of analytical parameters are inconsistent. "Parameters of Interest" in Table 25 of the work plan includes both radionuclides and hazardous substances known to be present at 200-BP-1. Parameters of Interest in Table 1 of the FSP do not include radionuclides but now include volatile organics and sodium. Captions for radionuclides in Table 25 of the work plan, additional major radionuclides in Table 1 of the FSP, and radionuclide analysis in Table 1 of the QAPP need to be consistent.

Recommendation. Develop discussion of minimum performance criteria in more detail. Make captions, titles analytical detection limits as well as Data Quality Objectives analytical levels consistent.

Unresolved Technical Issues

3. Section 3.1 (p. WP-51) (from Oct. 2, 1989 comments)

Deficiency. This comment pointed out the fact that bismuth and phosphate needed to be added to the source constituent list. It was also expected that bismuth would be added to the analytical parameters lists in Chapter 4, the FSP, and the QAPP. Analysis for all known contaminants is required.

Recommendation. Revise tables to include bismuth

Section 3.1.3 (p. WP-72) (from Oct. 2, 1989 comments)

4. Deficiency. As previously stated, these explanations are premature and are only partially correct and tend to mislead the reader. High levels of contaminants like nitrate, cobalt-60, technetium-99 and cyanide have never been found near B-Pond or the 216-B-2 trench. Paleostream channels with high hydraulic conductivities may exist, but this does not explain the extent of contamination emanating from 200-BP-1. These two statements illustrate the need for a thorough data review prior to proposal of contaminant transport hypothesis.

Recommendation. Please remove this discussion.

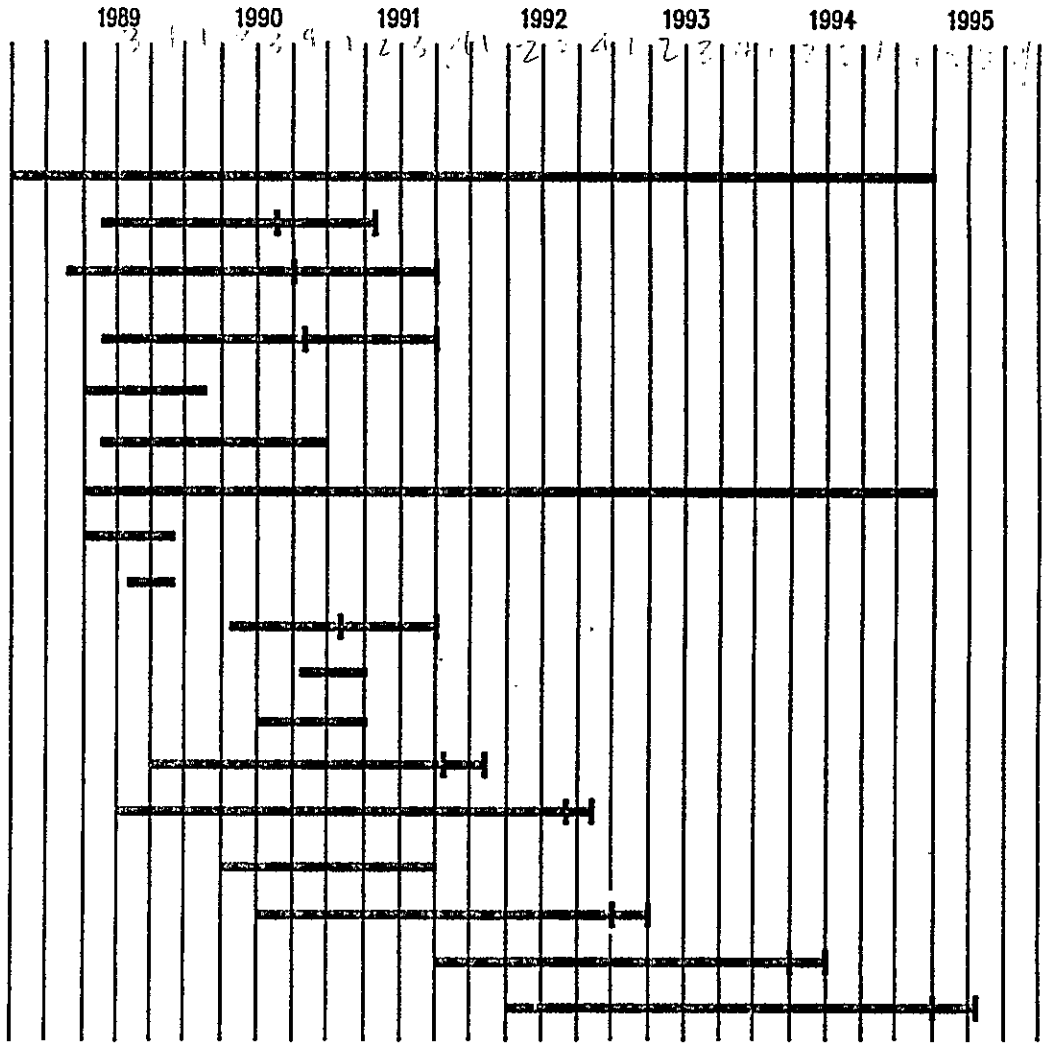
Section 5.1.2 (p. WP-132.) (new comment)

5. Deficiency. Due to the high cost of analysis for hazardous substances on highly radioactive samples, composite analysis has been accepted as an appropriate approach for 200-BP-1. A procedure for composite sampling and aggregation is needed to ensure that representative samples are taken for analysis.

Recommendation. Modify EII procedure 5.2 or develop an alternate procedure for aggregation and composite sampling of borehole samples. Early review of this procedure is required before composite sampling and analysis can proceed.

RI/FS Schedule

(FISCAL YEARS)



PHASE I REMEDIAL INVESTIGATION

- TASK 1 MANAGEMENT AND STATUS REPORTS
- TASK 2 SOURCE SAMPLING AND ANALYSIS
- TASK 3 SURFACE AND NEAR SURFACE SOIL SAMPLING AND ANALYSIS
- TASK 4 VADOSE ZONE SOIL SAMPLING AND ANAL.
- TASK 5 SEISMIC REFRACTION SURVEY
- TASK 6 INSTALLATION OF MONITORING WELLS
- TASK 7 GROUNDWATER SAMPLING AND ANALYSIS
- TASK 8 SITE TOPOGRAPHIC MAP
- TASK 9 BIOTA SURVEY
- TASK 10 COLUMN LEACH TEST
- TASK 11 HYDRAULIC PUMP TESTS
- TASK 12 SORPTION TEST
- TASK 13 BASELINE RISK ASSESSMENT
- TASK 14 EVALUATION AND REPORT

PHASE I FEASIBILITY STUDY

PHASE II FEASIBILITY STUDY

PHASE II REMEDIAL INVESTIGATION

PHASE III FEASIBILITY STUDY

Attachment #5

Commitments/Agreements Status List

200-BP-1 Operable Unit

December 14, 1989

Item No.	Action	Status
2BP1.1	DOE/WHC is proceeding with preliminary evaluation of all existing monitoring wells. A meeting will be held on or about November 17 to discuss this evaluation with EPA/Ecology.	Open. Documentation of evaluation provided. Discussions to be held at Jan UMM.
2BP1.4	Progress in bringing the 222-S capability on-line will be monitored by DOE/WHC in future UM meetings to anticipate potential problems and discuss contingencies. Evaluating use of INEL CLP lab for contingencies.	Open and ongoing.